

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

FILED  
CLERK'S OFFICE

CIVIL ACTION  
NO. 04-10994NMG  
JAN 26 P 1:14

PARENTS OF DANIELLE  
*Plaintiffs,*

v.

MASSACHUSETTS DEPARTMENT OF  
EDUCATION, DAVID P. DRISCOLL, COMMISSIONER;  
SCHOOL COMMITTEE FOR  
THE TOWN OF SHARON;  
SAM LIAO, ANDREW NEGENAZHL,  
DONALD GILLIGAN, JANE FURR, MITCH  
BLAUSTEIN AND SUAZANNE PEYTON  
*Defendants.*

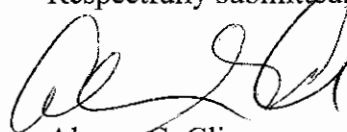
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MOTION FOR SUMMARY JUDGMENT AS TO COUNT I  
OF PARENTS' COMPLAINT

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Parents of Danielle, Plaintiffs in this matter, move for the entry of summary judgment as to Count I of their Complaint, doing so for those reasons set forth in their accompanying memorandum of law. They say that there are no disputes of material fact, as set out in their Concise Statement of Facts, and that therefore, for those reasons set forth in their supporting Memornadum of Law, they are entitled to judgment in their favor as a matter of law.

Respectfully submitted,



Alanna G. Cline  
Parents' Counsel  
300 Market St.  
Brighton, MA 02135  
617 783 5997  
BBO 086860

January 26, 2006

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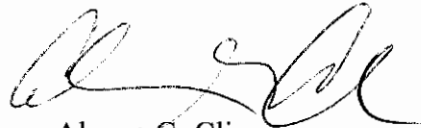
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CERTIFICATE OF SERVICE

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I, Alanna G. Cline, certify that I have served copies of the foregoing Motion for Summary Judgment as to Count I together with concise statement of facts and exhibits (two agency decisions), supporting memorandum awaiting leave of court for its filing, pursuant to the enclosed cover letter, by mailing same first class mail postage prepaid directed to counsel of record, Atty. Barry Mintzer, Deutsch Williams, 99 Summer Street, Boston, MA 02110-1213, and Amy Spector, Esq. Office of the Attorney General, Government Bureau, One Ashburton Place, Room 2019, Boston, MA 02108 this January 26, 2006.

I also certify having previously attempted to confer with counsel to narrow or reduce or resolve the issues.



Alanna G. Cline  
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